

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

JPMORGAN CHASE BANK, N.A.,

Plaintiff,

v.

CHARLIE JAVICE, OLIVIER AMAR,  
CHARLIE JAVICE, in her capacity as Trustee  
of CHARLIE JAVICE 2021 IRREVOCABLE  
TRUST #1, CHARLIE JAVICE, in her capacity as  
Trustee of CHARLIE JAVICE 2021  
IRREVOCABLE TRUST #2, and CHARLIE  
JAVICE in her capacity as Trustee of CHARLIE  
JAVICE 2021 IRREVOCABLE TRUST #3,

Defendants.

Case No. 1:22-cv-01621-MN

**[PROPOSED] ORDER GRANTING DEFENDANT  
CHARLIE JAVICE’S MOTION TO PARTIALLY LIFT  
THE PSLRA DISCOVERY STAY TO PERMIT DOCUMENT DISCOVERY**

Defendant and Counterclaim Plaintiff Charlie Javice, having filed a motion to partially lift the Private Securities Litigation Reform Act of 1995 (“PSLRA”) discovery stay (the “Motion”), and the Court having duly considered the Motion,

IT IS HEREBY ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2023 that:

1. The Motion is GRANTED.
2. The PSLRA discovery stay is PARTIALLY LIFTED.
3. The parties may engage in discovery solely for the production of documents and tangible things, pursuant to Federal Rules of Civil Procedure 26 and 34 and, as applied to nonparties, pursuant to Federal Rule of Civil Procedure 45. The PSLRA discovery stay shall remain in effect in all other respects, subject to further order of this Court after conferring with the parties to this action.

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The Honorable Maryellen Noreika